

**CITY OF IDAHO FALLS
ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING CHOICE
2016 - 2020
December 10, 2015**

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Jurisdiction Name: City of Idaho Falls, Idaho

Date: December 10, 2015

I. Introduction and Executive Summary of the Analysis

A. Who Conducted: M. Jerome Mapp, Principal, Planning and Facility Management

B. Participants:

- Idaho Housing and Finance Idaho Housing (IHFA)
- Intermountain Fair Housing Council (IFHC)
- Idaho Human Rights Commission (IHRC)
- Idaho Falls Downtown Development Corp. (IFDDC)
- United Way
- Partners for Prosperity Blackfoot Office
- YMCA
- Community Learning Understanding Belonging Inc. (CLUB Inc.)
- Eastern Idaho Community Action Partnership (EICAP)
- The Family Crisis Center
- Targhee Regional Public Transportation Authority (TRPTA)
- Habitat for Humanity
- Idaho Falls Rescue Mission
- Veterans Memorial Commission
- Idaho Dept. of Health and Welfare, Region 7
- City of Idaho Falls, Department of Community Development, Planning Division
- State of Idaho - Statues
- Greater Idaho Falls Association of REALTORS®
- Community Council of Idaho
- Idaho Migrant Council - Housing

C. Methodology Used: Survey and Personal Interviews

D. How Funded: The City of Idaho Falls, Community Development Services Dept.

E. Conclusions

1. Impediments Found and Actions to Address these Impediments

a. **Expansion of Inventory with regards to affordable housing.**

- 1) Continue to monitor the zoning ordinance and subdivision ordinance to ensure higher density housing and other affordable housing types are permitted by right;
- 2) Educate housing lenders on the low income housing needs of the community;
- 3) Discuss CDBG funding opportunities that could assist in buying down the cost of land for the development of affordable housing units.
 - a) Urban Renewal Agency funding; and
 - b) Housing Authority funding.

b. **The building community is not building affordable housing units.**

- 1) Expand and build relationships with the building community, and
- 2) Educate the building community regarding the need.

c. **Expansion of housing options.**

- 1) Work with IHFA to expand Section 8 expansion through landlords.

d. **The public is lacking knowledge of the Fair Housing Act.**

- 1) Expand public information regarding fair housing;
- 2) Utilize more of the material from IHFA, and
- 3) Participate in community events to educate the public regarding fair housing.

e. **There is a need to expand membership of minorities or protected classes as members on the Planning Commission.**

- 1) Continue to build relationships with the Hispanic and the protected class community, and
- 2) The Mayor should meet with members the Hispanic community to discuss and recruit membership to planning and other boards or commissions.

f. **Some developers and landlords continue to have a lack of understanding of housing accessibility requirements under the Fair Housing Act.**

- 1) Continue public outreach through workshops and presentations to community leaders.

g. **Some landlords continue to have a lack the understanding of the requirements regarding service animals.**

- 1) Continue public outreach through workshops and presentations to community leaders, and
 - 2) Support and include the training of this subject at fair housing workshops.
- h. **There are some gaps in public transportation access to services for protected classes.**
- 1) Work with TRPTA to expand services, where funding will allow.

II. Jurisdictional Background Data

A. DEMOGRAPHIC DATA

The City of Idaho Falls is a county seat of Bonneville County (104,234) located in Eastern Idaho. The Idaho Falls MSA (Metropolitan Statistical Area) consist of Jefferson and Bonneville Counties. The cities of Ammon, Iona, Rigby, Ucon, Menan, Ririe, Roberts, Hamer, Irwin, Lewisville, Mud Lake and Swan Valley are located within the MSA.

As identified in Exhibit 1, the 2015, US Census and American Community Survey, the City of Idaho Falls has a population of 57,536. Idaho Falls has seen slow, but steady growth over the last three years, due to the Great Recession (of 2007-2009). This will also be reflected in housing growth, during this period of time.

EXHIBIT 1 - POPULATION, 2013

Year	1990	2010	2013
Population	51,110	56,813	57,536

Source: US Census and American Community Survey, 2013

As described in Exhibit 2, the median age of population in the year 2013 was 32.9 years, which is a 1.9% increase compared to the 2000 census. Note that the gender population shows only a 1,154 difference in population. In addition, Exhibit 3 shows that approximately 29% of the total population is under 18 years of age, while 12% is over sixty five years of age. The male and female population are near even. The median age has increased by 1.9% in the last 3 years, according to the US Census and American Community Survey.

EXHIBIT 2 AGE & GENDER DISTRIBUTION, 2013

Years	Number
Under 5	5,300
5 to 9	4,487

10 to 14	3,876
15 to 19	3,937
20 to 24	3,602

25 to 29	4,548
30 to 34	4,315
35 to 39	3,368
40 to 44	3,093
45 to 49	3,584
50 to 54	3,436
55 to 59	3,407
60 to 64	3,204
65 to 69	1,955
70 to 74	1,635
Years	Number
75 to 79	1,261
80 to 84	922

85 to and over	1,196
Total Female	29,345
Total Male	28,191
Median Age (2013)	32.9
Median Age (2000)	32.3
Median Age % Change	1.9%
Total Population	57,536

Source: US Census and American Community Survey, 2013

Exhibit 3 shows that 2013 population percentages by age remained steady in the last decade with changes of a high 3.9% to a low of -3.4% compared to 2000.

EXHIBIT 3 - AGE & GENDER DISTRIBUTION AND CHANGE 2000 - 2013

Age	2000		2013	
	Number	Percent of Total	Number	Percent of Total
Under 18	15,381	30.3	16,524	28.7
8-34	11,694	23.1	13,951	24.2
35-44	7,422	14.6	6,461	11.2
45-64	10,590	20.9	13,631	23.7
65 and over	5,643	11.1	6,969	12.1
Total population	50,730		57,536	

Source: US Census and American Community Survey, 2013

As Exhibits 4, 5, 6 and 7 describes, the City of Idaho Falls does not have a very large minority population. It has been recorded that 90.4% of the population is considered White alone. The largest minority alone population is American Native with a population of 413, but those who identify that they are Some other Race Alone is 2,968. The total minority population totals to 9.6% or 5,538 of total population. The largest minority population is Hispanic with 7421 or 12.9 % of the population.

EXHIBIT 4 - POPULATION BY RACE, 2013

Race	Number	Percent of Total
White alone	51,998	90.4
Black or African American	389	0.7
American Native alone	413	0.7
Asian alone	298	0.5
Native Hawaiian & other Pacific is alone	25	0.0
Some other race alone	2,968	5.2
Two or more races	1,445	2.5
Total population	57,536	

Source: US Census and American Community Survey, 2013

EXHIBIT 5 - HISPANIC POPULATION, 2013

Hispanic Population	Number	Percent of Total
Hispanic or Latino (of any race)	7,421	12.9
Not Hispanic or Latino	50,115	87.1
White alone	48,230	83.8
Black or African American alone	187	0.3
American Native alone	284	0.5
Asian alone	298	0.5
Native Hawaiian & other Pacific is alone	25	0.0
Some other race alone	0	0.0
Two or more races	1,091	1.9
Total population	57,536	

Source: US Census and American Community Survey, 2013

EXHIBIT 6 - AMERICAN NATIVE & ALASKA NATIVE POPULATION, 2013

American Native & Alaska Native Population	Number	Percent of Total
Total Native Population	413	0.7
American Native Tribes	300	0.6
Alaska Native Tribes	11	0.0
Non-Specific Tribes	72	0.1
Total population	57,536	

Source: US Census and American Community Survey, 2013

There are eight specific tribes identified in the US Census and American Community Survey.

EXHIBIT 7 - AMERICAN NATIVE & ALASKA NATIVE POPULATION, 2013

American Indian Tribes (Specific)	Number
Cherokee	22
Chippewa	4
Choclaw	18
Navajo	102
Palute	24
Shoshone	69
All Other Tribes	90
Alaska Native Tribes	
Alaska Athabaskan	11
Total	72

Source: US Census and American Community Survey, 2013

B. INCOME DATA

The highlights of Exhibits 8, 9 and 10 are described by Income, Employment and Income Benefits.

Exhibit 8, described by Income Data, shows that approx 25% of the households make less than \$25,000 per year.

EXHIBIT 8 - INCOME DATA

Income	Households	Families	Married-couples families	Non-family households
Total	20,950	14,447	10,809	6,473
Less than \$10,000	7.2%	5.3%	2.1%	13.2%
\$10,000 to \$14,999	6.7%	3.3%	2.3%	14.5%
\$15,000 to \$24,999	10.7%	7.5%	3.9%	18.8%
\$25,000 to \$39,999	13.5%	11.9%	11.0%	17.1%
\$35,000 to \$49,000	16.3%	18.5%	16.1%	12.5%
\$50,000 to \$74,000	18.2%	19.9%	22.7%	11.9%
\$75,000 to \$99,000	11.1%	12.7%	15.1%	6.4%
\$100,000 to \$149,000	10.8%	13.0%	16.7%	4.7%
\$150,000 to \$199,000	3.0%	4.2%	5.1%	0.3%
\$200,000 or more	2.7%	3.7%	4.9%	0.4%

Source: US Census and American Community Survey, 2013

C. EMPLOYMENT DATA

Exhibit 9, Employment Data states that the employable population is 42,747, while 27,955 residents are in the labor force. The employment rate is 60.6%, while the unemployment rate is 4.7 %.

EXHIBIT 9 - EMPLOYMENT STATUS

Subject	Estimate	Percent
Population 16 years and over	42,747	
In labor force	27,955	65.4
Civilian labor force	27,933	65.3
Employed	25,912	60.6
Unemployed	2,021	4.7
Armed Forces	22	0.1
Not in labor force	14,792	34.6
Females 16 years and over	21,821	
In labor force	13,060	59.9
Civilian labor force	13,060	59.9
Employed	12,343	56.6
Own children under 6 years	6,304	63.04
All parents in family in labor force	3,545	56.2
Own children 6 to 17 years	9,665	9.67
All parents in family in labor force	6,762	70.0

Source: US Census and American Community Survey, 2013

In regards to Exhibit 10, Income and Benefits, 6,284 of Idaho Falls citizens income comes from social security, 3,527 have retirement income and 970 receive Supplemental Security Income. Food Stamps/SNAP benefits are provided to 3,243 residents.

EXHIBIT 10 – INCOME AND BENEFITS (IN 2013 INFLATION ADJUSTED DOLLARS)

Income	Estimate	Percent
Total	20,950	20,950
Less than \$10,000	1,498	7.2
\$10,000 to \$14,999	1,402	6.7
\$15,000 to \$24,999	2,233	10.7
\$25,000 to \$39,999	2,821	13.5
\$35,000 to \$49,000	3,416	16.3
\$50,000 to \$74,000	3,805	18.2
\$75,000 to \$99,000	2,316	11.1

\$100,000 to \$149,000	2,268	10.8
\$150,000 to \$199,000	622	3
\$200,000 or more	569	2.7
Median household income (dollars)	45,803	(x)
Mean household income (dollars)	61,442	(x)
With earnings	16,783	80.1
Mean earnings (dollars)	61,188	(x)
With Social Security	6,284	30
Mean Social Security income (dollars)	17,085	(x)
With retirement income	3,527	16.8
Mean retirement income (dollars)	20,505	(x)
With Supplemental Security Income	970	4.6
Mean Supplemental Security Income (dollars)	9,425	(x)
With cash public assistance income	929	4.4
Mean cash public assistance income (dollars)	2,272	(x)
With Food Stamp/SNAP benefits in the past 12 months	3,243	15.5
Families	14,477	14477
Less than \$10,000	766	5.3
\$10,000 to \$14,999	479	3.3
\$15,000 to \$24,999	1,092	7.5
\$25,000 to \$39,999	1,718	11.9
\$35,000 to \$49,000	2,680	18.5
\$50,000 to \$74,000	2,876	19.9
\$75,000 to \$99,000	1,838	12.7
\$100,000 to \$149,000	1,885	13
\$150,000 to \$199,000	603	4.2
\$200,000 or more	540	3.7
Median family income (dollars)	53,290	(x)
Mean family income (dollars)	70,804	(x)
Per capita income (dollars)	22,971	(x)
Non-family households	6,473	6473
Median non-family income (dollars)	26,427	(x)
Mean non-family income(dollars)	37,388	(x)
Median earnings for workers (dollar)	22,887	(x)
Median earnings for male full-time, year-round workers (dollars)	44,730	(x)
Median earnings for female full-time, year-round workers (dollars)	28,439	(x)

Source: US Census and American Community Survey, 2013

Exhibit 11, Employment Status - Poverty, 10.7% or 2,991 people live below the poverty level.

EXHIBIT 11 - EMPLOYMENT STATUS - POVERTY

Subject	Total	Below Poverty Level	Percent Below Poverty Level
Civilian Labor Force 16 years and over	27,933	2,991	10.7
Employed	25,912	2,394	9.2
Male	13,569	1,057	7.8
Female	12,343	1,337	10.8
Unemployed	2,021	597	29.5
Male	1,304	296	22.7
Female	717	301	42.0

Source: US Census and American Community Survey, 2013

Exhibit 12 describes the number of residents, over the last 12 months, who live below the Poverty level. This exhibit show that 11.60% of all families and 22.80% of related children under 5 years live below the poverty level.

EXHIBIT 12 - PERCENTAGE OF FAMILIES AND PEOPLE WHO'S INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL

Subject	Percent
All families	11.60%
With related children under 18 years	17.50%
With related children under 5 years only	25.80%
Married couple families	6.40%
With related children under 18 years	8.80%
With related children under 5 years only	8.60%
Families with female householder, no husband present	33.30%
With related children under 18 years	39.80%
With related children under 5 years only	59.90%
All people	14.40%
Under 18 years	18.10%
Related children under 18 years	17.80%
Related children under 5 years	22.80%
Related children 5 to 17 years	15.40%

18 years and over	12.90%
18 to 64 years	14.00%
65 years and over	7.30%
People in families	12.00%
Unrelated individuals 15 years and over	26.40%

Source: US Census and American Community Survey, 2013

Exhibit13 identifies the impacts of poverty levels for men at 12.6%, females at 16.2 %. Based upon race White - 12.7%, Black or African American - 29.3%, American Indian and Alaska Native - 32.3%, Asian - 9.8%, Native Hawaiian and Other Pacific Islander - 72.0%, Some other race - 29.5%, Two or more - 37.6% and Hispanic or Latino origin (of any race) - 26.0% live below the poverty level.

EXHIBIT 13 - POVERTY LEVEL

Subject	Total	Below Poverty Level	Percent Below Poverty Level
Population for whom poverty status is determined	56,642	8,180	14.4%
AGE			
Under18 years	16,340	2,962	18.1%
Related children under 18 years	16,284	2,906	17.8%
18 to 64 years	33,461	4,698	14.0%
65 years and over	6,841	500	7.3%
SEX			
Male	27,670	3,473	12.6%
Female	28,972	4,687	16.2%
RACE AND HISPANIC OR LATINO ORIGIN			
One Race	55,266	7,642	13.8%
White	51,223	6,491	12.7%
Black or African American	389	110	29.3%
American Indian and Alaska Native	365	118	32.3%
Asian	296	29	9.8%
Native Hawaiian and Other Pacific Islander	25	18	72.0%
Some other race	2,968	876	29.5%
Two or more	1,376	518	37.6%
Hispanic or Latino origin (of any race)	7,304	1,899	26.0%
White alone, not Hispanic or Latino	47,560	5,672	11.9%

Source: US Census and American Community Survey, 2013

D. HOUSING PROFILE

The following exhibits describes general characteristics of the housing stock in the City of Idaho Falls. Exhibit 14 describes the changes in building permits within the last 10 years. The year 2008 was the last year of the housing boom in Idaho Falls and the nation before the economy collapse. The years 2009 - 2011 saw a slump in building permits due to the recession. Years 2012 - 2014 show signs of recovery for single family dwelling units. Multi-family units are still lagging in numbers compared to the year 2008.

EXHIBIT 14 - BUILDING PERMITS BY YEAR

Year	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Single-family	309	314	312	1625	69	76	60	134	145	116
Multi-family	207	143	12	671	0	9 (80u)	1 (4u)	0	2 (50u)	0

Source: City of Idaho Falls

Exhibit 15 identifies a steady increase of total dwelling units from 1990 - 2010. The average number of units each decade was approximately 2,900 dwelling units. From 2010 to 2013 there were approximately 900 units.

EXHIBIT 15- TOTAL HOUSING UNITS

Year	1990	2000	2010	2013
Total	16,845	19,771	22,680	23,561

Source: US Census and American Community Survey, 2013

Exhibit 16 Homeownership 64.8%, 68.2% and 67%, Exhibit 17, Rental Rate Comparison 35.2%, 31.7% and 33.0% has remained steady.

EXHIBIT 16 - HOME OWNERSHIP RATE COMPARISON

Year	1990	2000	2006 - 2013
Total	64.8%	68.2%	67.0%

Source: US Census and American Community Survey, 2013

EXHIBIT 17 – RENTAL RATE COMPARISON

Year	1990	2000	2006 - 2013
Total	35.2	31.7	33.0%

Source: US Census and American Community Survey, 2013

Exhibit 18 shows that approximately 44% of all housing units were built prior to 1969.

*** Exhibit 18 - YEAR STRUCTURES BUILT**

Subject	City of Idaho Falls, Idaho
Built 2010 or later	90 (971 estimate to 2013)
Built 2000 to 2009	3,520
Built 1990 to 1999	2,823
Built 1980 to 1989	2,472
Built 1970 to 1979	4,141
Built 1960 to 1969	2,566
Built 1950 or earlier	7,949
Total	23,561

Source: US Census and American Community Survey, 2013

Exhibit 19 compares vacancy rate for residential dwelling units between years 2000 - 11.5% and 2013 - 4.5%.

*** EXHIBIT 19 – VACANCY RATES**

Subject	2000	2013
Total Housing Units	19,771	23,561
Occupied Housing Units	21,467	20,950
Vacant Housing	978	2,611
Rental Vacancy Rate	5.9%	11.0%
Homeownership Vacancy	1.5%	4.5%

Source: US Census and American Community Survey, 2013

Exhibit 20 identifies a continued increase in the number of housing units, and identifies the value of homes and rent within a 33 year period. The largest jump was between 2000 and 2013, where the City saw increases of all categories during the housing boom and then the slow down due to the 2007-2009 Great Recession.

EXHIBIT 20 – HOUSING UNITS

Year	1980	1990	2000	2013
Total Housing Units	15,037	16,845	19,826	23,561
Median Value of Owner-Occupied Housing	48,200	63,400	90,100	140,000*
Median Rent	\$198	\$293	\$475	\$675

Source: US Census and American Community Survey, 2013

According to the Snake River Regional MLS Association of Realtors, the 2014 median home value in Bonneville County is \$140,000*.

Exhibits 21 and 22 describes the percent of housing cost regarding home ownership in 2013. HUD guidelines state that one shouldn't pay more than 30% of the monthly income for housing.

EXHIBIT 21 - SELECTED MONTHLY HOUSING COST AS A PERCENT OF HOUSEHOLD INCOME (SMOCAPI) 2013

Owner-occupied housing w/a mortgage (excluding units where SMOCAPI cannot be computed)	9,281
Less than 20.0 percent	1,610
20.0 to 24.9 percent	4,311
25.0 to 29.9 percent	1,297
30.0 to 34.9 percent	1,355
35.0 percent or more	708

Source: US Census and American Community Survey, 2013

Housing units without a mortgage (excluding units where SMOCAPI cannot be computed)	4,669
Less than 10.0 percent	2,469
10.0 to 14.9 percent	957
15.0 to 19.9 percent	362
20.0 to 24.9 percent	247
25.0 to 29.9 percent	218
30.0 to 34.9 percent	102
35.0 percent or more	314

Source: US Census and American Community Survey, 2013

Exhibits 22 and 23 describes the percent of housing cost regarding rentals in 2013. HUD guidelines state that one shouldn't pay more than 30% of the monthly gross income for housing.

EXHIBIT 22 - GROSS RENT

Cost	Number
Occupied Units Paying Rent	6,649
Less than \$200	72
\$200 to \$299	227
\$300 to \$399	1,021
\$500 to \$599	2,836
\$750 to \$999	1,628
\$1,000 to \$1499	621
\$1,500 or more	241
Median (dollars)	675
No rent paid	271

Source: US Census and American Community Survey, 2013

EXHIBIT 23 - GROSS RENT AS PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)

Occupied units paying rent (excluding units where GRAPI cannot be computed)	6,602
Less Than 15.0 percent	821
15.0 to 19.9	678
20.0 to 24.9	1,067
25.0 to 29.9	765
30.0 to 34.9	606
35.0 percent or more	2,665
Not computed	315
No rent paid	271

Source: US Census and American Community Survey, 2013

E. OTHER RELEVANT DATA

1. Maps - The following 2010 maps from census tracts 9707, 9711 and 9712 are the largest concentration of LMI populations in the City of Idaho Falls. The City has invested Community Development Block Grant (CDBG) funding within these areas.

The City of Idaho Falls continues to monitor these census tracts and identify any changing trends that may affect fair housing.

Refer to Exhibit 24 Map #7, page 18

Refer to Exhibit 25 Map #9, page 19

Refer to Exhibit 26 Map #10, page 20

EXHIBIT 24 - MAP 7 - % of Persons Living Below Poverty Level

In addition, Census tract 9712 is within the Idaho Falls Downtown Development Corporation (IFDDC) boundaries. Redevelopment plan are underway for the area along the river at Memorial Drive and an existing historic hotel at the corner of Park Ave and Constitution Way. Part of that project will include remodeling an historic hotel where some LMI populations reside. IFRDA has requested that the proposal should include a component to provide replacement housing for any displaced residents. It has also recommended providing a mix of subsidized and market rate housing.

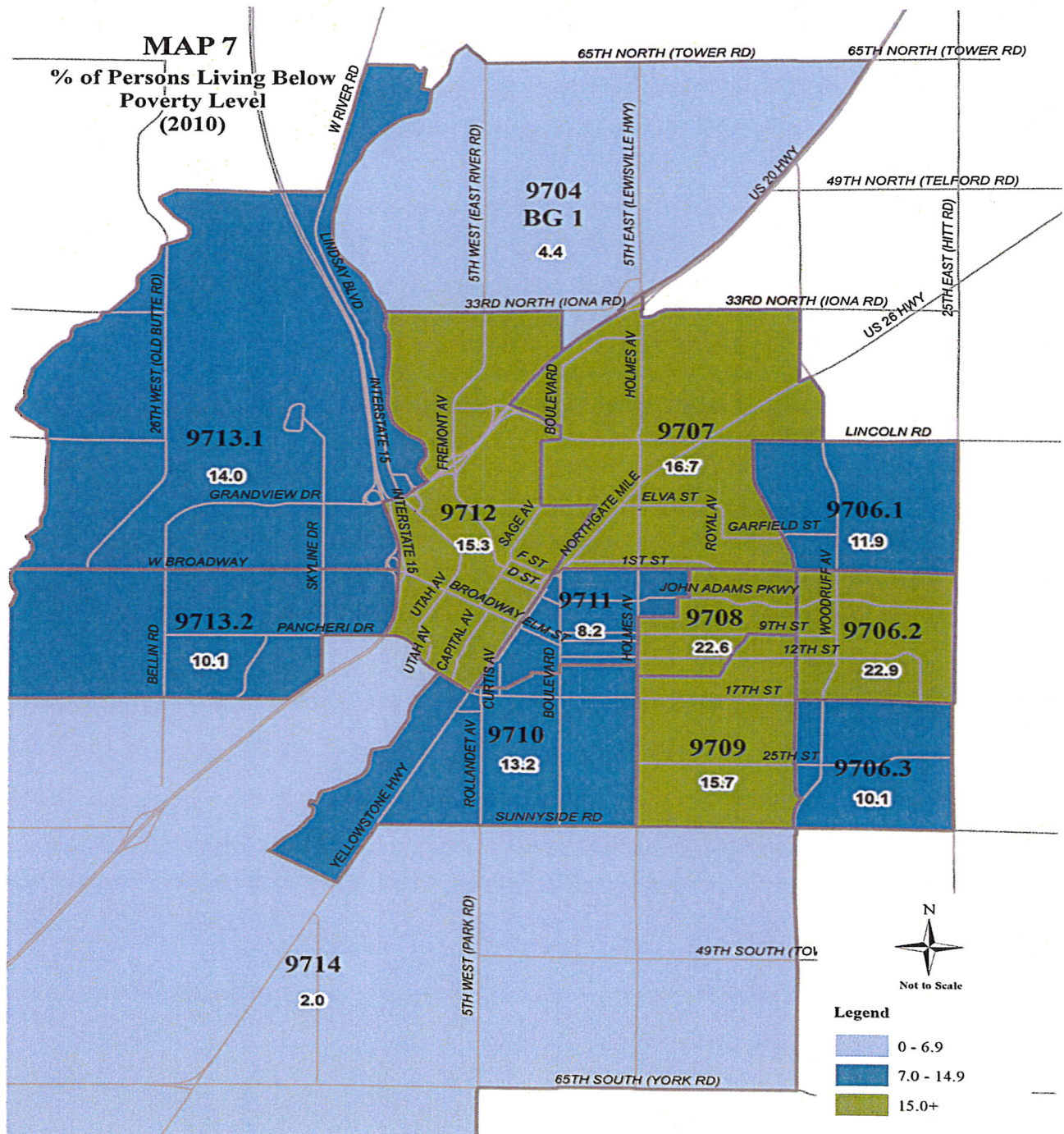


EXHIBIT 25 - MAP 9 - % of Home Owners Paying > 30% of Income on Rent (2010)

Exhibit 25 describes census tract 9707, 9711 and 9712.

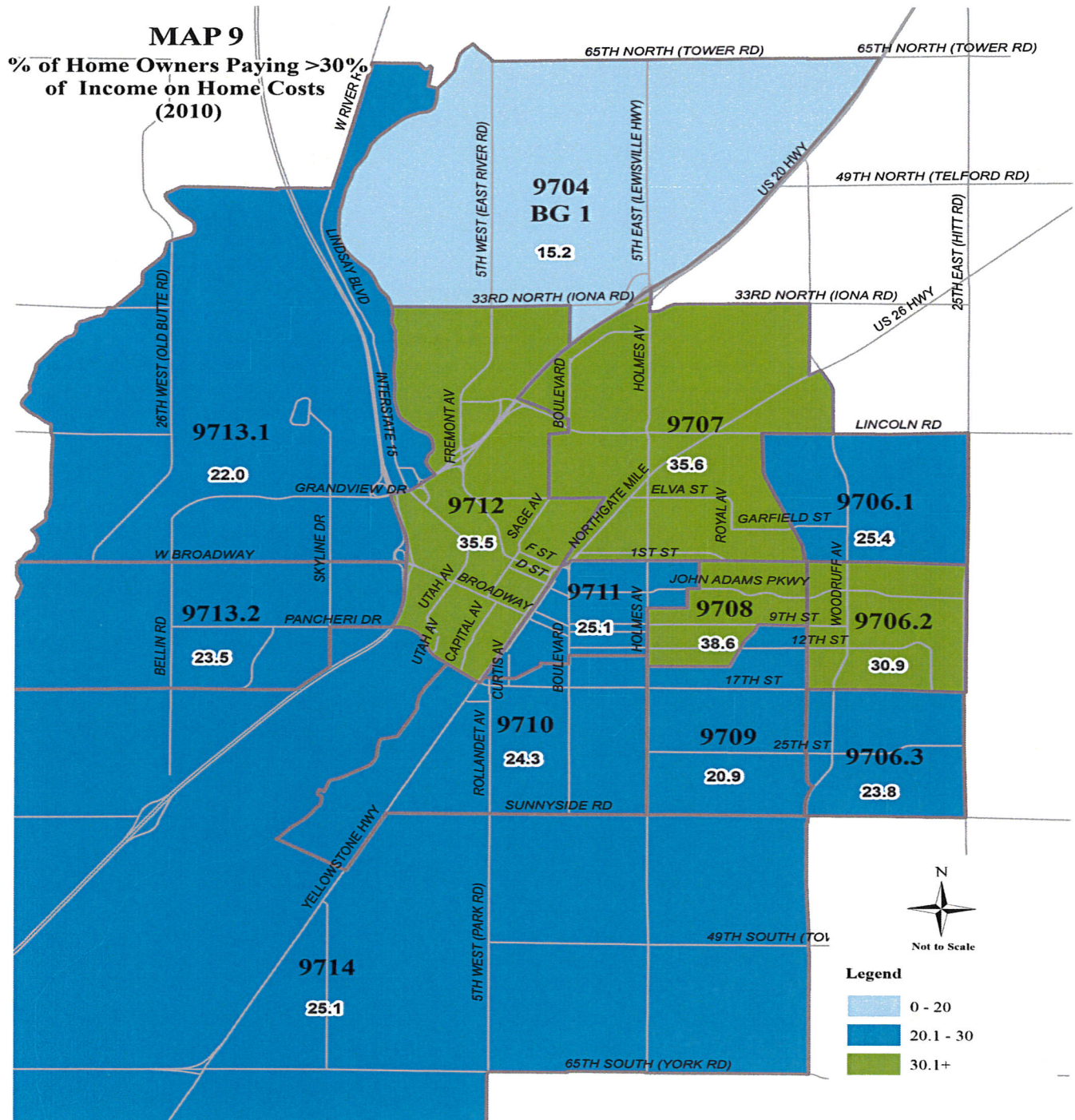
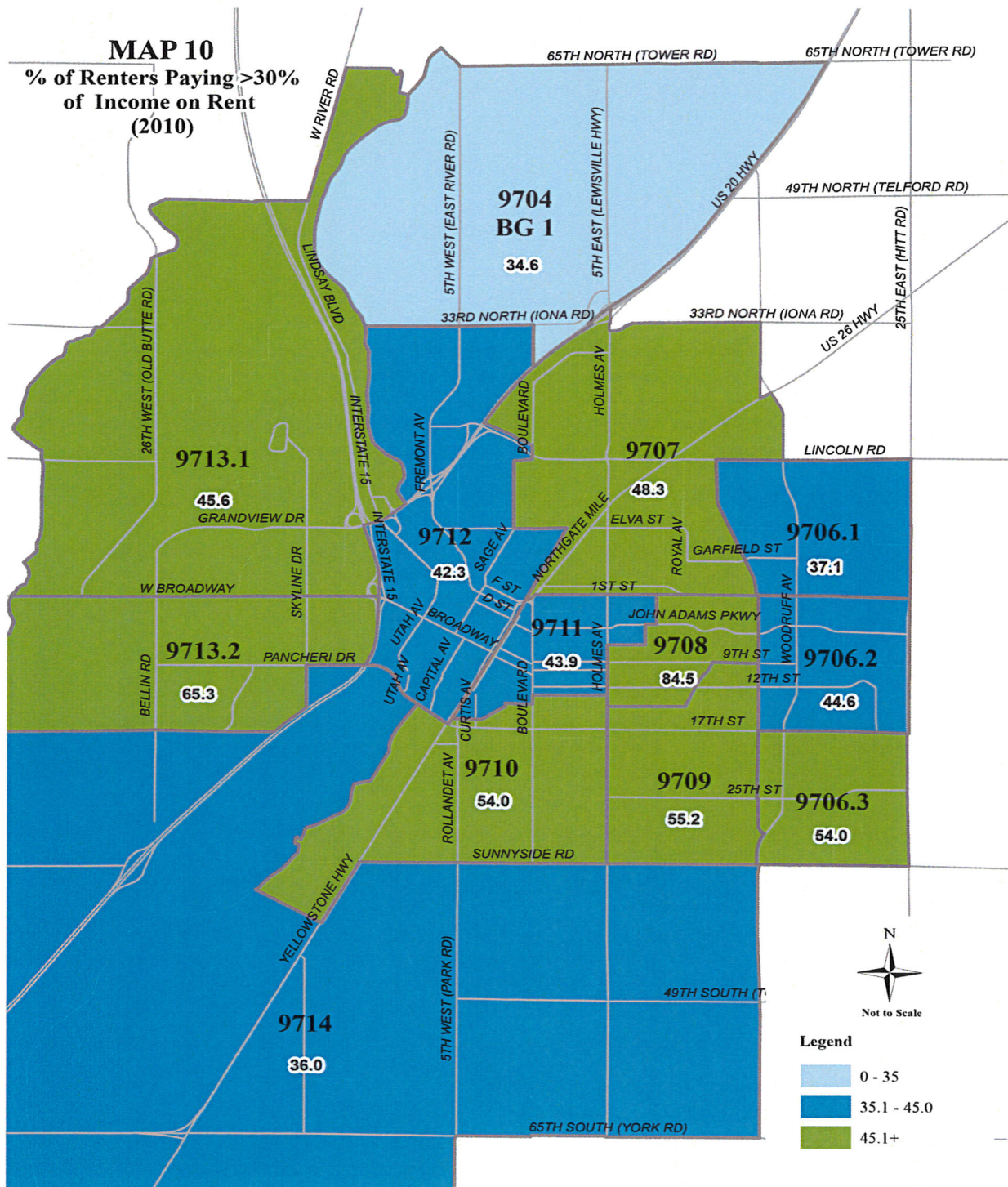


EXHIBIT 26 - MAP 10 - % of Renters Paying > 30% of Income on Rent (2010)

Exhibit 26 describes census tract 9707, 9711 and 9712.



2. Migrant Housing

Based upon an interview with the Community Council of Idaho there is no migrant housing in Idaho Falls. The closest migrant housing is located at Colonia Cesar Chavez 761 W. Center St. #25 Blackfoot, ID 83221.

3. **Special Report** - to identify the housing needs in Idaho Falls, the City conducted a *Housing Needs Assessment* and *Non-homeless Special Needs Assessment*, *Non-Housing Community Development Needs Assessment*, *Housing Market Analysis*, *Number of Housing Units and Housing Market Analysis*, and *Cost of Housing in 2015*. **Participating Agencies are identified in each section.**

Housing Needs Assessment

Habitat for Humanity builds affordable or single family housing units for families with homeownership opportunities.

Idaho Falls Rescue Mission has 3 shelters and provides both permanent as well as transitional temporary housing services to adult males 18 years of age and older through the Ark men's shelter, the Ruth House (for women), and FAITH (for families).

Idaho Housing and Finance Idaho Housing (IHFA) is a uniquely created and organized financial institution and administrator of affordable housing resources. In its simplest form, Idaho Housing's mission is to provide funding for affordable housing opportunities in Idaho communities where they are most needed and when it is economically feasible.

Eastern Idaho Community Action Partnership (EICAP) is has served the communities of Eastern Idaho for 40 years. EICAP strives to help those in need by providing the essential services needed to guide people from living a life filled with need to embracing a life of possibilities through self sufficiency. Through resources from the government, churches, individuals and the overall community, we work to empower people. Through this, we strive to build a stronger community one life at a time. One of the services consist of is affordable housing.

Community Learning Understanding Belonging Inc. (CLUB Inc.) Since 1988, CLUB, Inc. has been providing services which include counseling, medication management and addictive disorder treatments, as well as, community outreach, rehabilitation, crisis intervention, education, and mental health evaluations. CLUB, Inc. recognizes stable housing as an integral part of the well-being of an individual or family who are working to overcome various difficulties and problems in their lives.

United Way specialties are understanding the myriad of struggles facing the community and improving the lives of individuals and families.

Comments and input provided by the agencies who participated in the survey and their responses to follow up questions are provided below.

1. Describe the number and type of single person households in need of housing assistance.

- “Single Family head of household shelter beds are consistently full. Those who have disabilities and the elderly. In addition, people are struggling with addiction, mental health issues, unemployment and underemployment. In regards to underemployment, individuals are typically working minimum wage jobs (\$1160.00 gross per month) or SSI/SSDI is the main source of income. These households also have transportation barriers, either no vehicle or an unreliable vehicle. The transportation barrier narrows the housing options.”

2. Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

- The Rescue Mission indicated that “approximately 30% of their clients are disabled, and 10% are known victims of domestic violence.”

3. What are the most common housing problems?

- “In the Idaho Falls Metropolitan area there are 5,023 households that are paying more than 30% of their monthly income for rent. (35.3% of the rental units) so I would have to say the most common problem is affordability. Secondly, would be the poor conditions of rental homes and apartments in our area.”
- “The most common housing problem is affordable housing. There is not enough inventory.”
- “Not enough funding or budget authority, landlords not willing to work with them though the rental assistance program, illegal evictions, and there is enough housing but not enough landlords willing to work with.”
- “Cost, households with children, discriminatory housing, safe neighborhoods.”
- “Affordable housing is a large barrier. Families and individuals with very low income, which creates difficulty maintaining stability and finding affordable housing. Many of these individuals also have poor credit, which creates another barrier to obtaining housing. The landlord may request a

co-signer, which is not an option for these individuals, as their support system is exhausted or non-existent. Transportation creates yet another barrier as they need to find affordable housing in a specific location as they have no transportation to and from work or to other resources necessary to maintain their stability.”

4. Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

- “Several of the families have been living with relatives. One family lost their housing because the landlord decided to sell the home they were renting. Two of the families were going through a divorce or separation.”
- “These individuals and families have minimum wage jobs, deal with addiction issues, have mental illness, and/or have physical disabilities.”
- “Characteristics include little-no education, no family support, unwanted pregnancies, addiction, and legal issues. Need low cost/safe housing.”
- “Many of these individuals are struggling with mental illness and/or substance use disorders. There may also be learning disabilities in effect. The individuals lack community support, such as case management, substance use disorder treatment, mental health counseling, and prescribed medications (typically these would be Medicaid billable services). Supportive Services need to be in place for those exiting the rapid re-housing program. As the “program” support may be the only supportive services the individual has in place.”

5. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

- “Uses low-income, age, disadvantaged, vulnerable, use community census info, receiving services by other providers.”
- “Really low incomes.”

6. Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness:

- “Affordability”;
- “2-3 years unless terminal illness”

7. What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

- “Habitat has two families on the waiting list at this time. We have one family, a single mom with two children that is volunteering in anticipation of applying for our rehab home located at 1295 Bannock. She is recently separated and is currently couch surfing. A second family, an extended family consisting of a single mom, her son and her father, working on their home located at 1080 Hillview. This family currently lives in Rigby in a one bedroom home with inadequate plumbing.”
- “No public housing available or waiting list.”
- “There are currently 647 families on our waiting list that reside in the City of Idaho Falls. 260 of those families qualify for one bedroom units, so they are one or two member households. 248 of these are also elderly or disabled households.”
- “Aspen Park has 24 families.”

8. Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of housing?

- “Habitat works with families who earn between 25% and 60% of the median income so affordability is the primary concern. A second concern the condition of the home - many of the rental homes are in serious need of repair. Third is overcrowding.”
- “Low-income, senior disabled, and diagnosed disabled housing shortage.”

9. How do these needs compare to the housing needs of the population at large?

- “50% of renters pay more than the 30% of their monthly income for housing compared to 24.9% of homeowners. Also, many of the homes in Habitat's target area are in need of repair. Again, the major problem has to do with affordability. Many families in this neighborhood are on fixed incomes and do not have the financial resources needed to maintain their homes.”

Non-Homeless Special Needs Assessment

Habitat for Humanity builds affordable single family housing units for families with homeownership opportunities.

Targhee Regional Public Transportation Authority (TRPTA) provides regional transportation service to Idaho Falls and the surrounding area.

Fixed Routes in Idaho Falls ONLY: Four (4) fixed routes

(Blue, Green, Yellow and Red) will move along the same route from 7:00 am to 5:30 pm with set stops and times. The cost for the new fixed routes is now \$1.75 General Public, \$.75 Senior/Student/Disabled.

Paratransit Service in Idaho Falls ONLY: Paratransit Service is (curb-to-curb) service for ADA eligible individuals who are within the paratransit boundaries shown on the map above. Paratransit rides must be scheduled the prior day by 4:00 pm. The cost is \$3.50 each way. In order to determine eligibility you must call the Paratransit Administrator at 208-535-0356, ext. 120 to get an application and appointment. These appointments are at no charge.

Idaho Legal Aid (ILA) services supports issues that impact Idaho residents regarding domestic violence, homelessness, food, healthcare issues and benefits, discrimination, outreach and education and supporting coalitions among the legal community to fight social problems.

The Family Crisis Center promotes and provides safety to victims of domestic violence and sexual assault while engaging in the community. The Family Crisis Center serves victims of domestic violence and sexual assault in Madison, Jefferson, Fremont, and Clark County, approximately 4,500 square miles. They serve both English and Spanish speaking residents.

Idaho Falls Downtown Development Corp. (IFDDC) concentration is within historical downtown which is the regional center for commerce, culture and leisure activities for residents and visitors.

Eastern Idaho Community Action Partnership (EICAP) is has served the communities of Eastern Idaho for 40 years. EICAP strives to help those in need by providing the essential services needed to guide people from living a life filled with need to embracing a life of possibilities through self sufficiency. Through resources from the government, churches, individuals and the overall community, we work to empower people. Through this, we strive to build a stronger community one life at a time. One of the services consist of is affordable housing.

Community Learning Understanding Belonging Inc. (CLUB Inc.) Since 1988, CLUB, Inc. has been providing services which include counseling, medication management and addictive disorder treatments, as well as, community outreach, rehabilitation, crisis intervention, education, and mental health evaluations. CLUB, Inc. recognizes stable housing as an integral part of the well-being of an individual or family who are working to overcome various difficulties and problems in their lives.

1. Describe the characteristics of special needs populations in your community:

- “Low to Moderate Income, Elderly without cars, mentally impaired.”
- “Disabled: individuals that have difficulty with authority, social security help; Mental health; Elderly: collections, consumer protection, end of life benefits, emergency guardianship; Domestic violence victims: personal strength and resources, lack of community support.”
- “I do not have any statistics to quote here, but based on our past experience approximately one third of the households that qualify for habitat housing have a family member with special needs. We have built homes for several children confined to wheelchairs and also for an adult survivor of polio.”
- “Alcohol and drug addicts, mental illness, substance abuse. Individuals will self identify and a case manager will determine basic needs.”
- “Accessibility for disabled, Low to moderate income housing improvements downtown, public facilities.”
- “Low-income, Senior Disabled, Diagnosed Disability.”
- “Many of these individuals are struggling with mental illness and/or substance use disorders. There may also be learning disabilities in effect. The individuals lack community support, such as case management, substance use disorder treatment, mental health counseling, and prescribed medications (typically these would be Medicaid billable services). Supportive Services need to be in place for those exiting the rapid re-housing program. As the “program” support may be the only supportive services the individual has in place.”

2. What are the housing and supportive service needs of these populations and how are these needs determined?

- “ADA access to bus stops; Bus stop shelters; Bike racks on buses; Reliable fixed routes; Expanded routes to neighboring communities; Increased signage for visibility of services.”
- “Income/asset scale 125% uses software to assess assets. Works off of a priority list. Program is grant driven. There are a lot of cases in Idaho Falls compared to the rest of the county. Current funding is restricted to rural funds but Idaho Falls doesn't count. There is a lot of poverty and drug culture that most don't see. Domestic violence number higher than the rest of the state.”
- “Habitat for Humanity, whenever possible, builds "visitable" homes. These homes are not totally accessible, but are equipped with ramps and have bathroom access for those persons confined to wheelchairs.”
- “Housings biggest gaps: loss of job, mental illness, not free of drugs long enough, more halfway houses. Assistance in accessing providers and basic medical needs. Providers don't fully understand HUD rules, more training is needed.”
- “ADA improvements downtown, Yellowstone crossing crosswalk compliance, water and sewer upgrades downtown, public restrooms downtown.”
- “Low-income housing for seniors. There is a growing demand for senior housing as demographics are changing.”
- “Many of these individuals are struggling with mental illness and/or substance use disorders. There may also be learning disabilities in effect. The individuals lack community support, such as case management, substance use disorder treatment, mental health counseling, and prescribed medications (typically these would be Medicaid billable services). Supportive Services need to be in place for those exiting the rapid re-housing program. As the “program” support may be the only supportive services the individual has in place.”
- “Supportive services, medications, mental health treatment, job placement opportunities, etc. Employment help for those with addiction or mental health. Job coaching and placement, improving basic skills. No mental health resources.”

3. Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

- “Not a lot of HIV/AIDS cases only 3 last year. Primarily housing cases. Not a large part of what they handle. Public policies that affect this group:

a resolution to strengthen fair housing for the LGBT community, statewide landlord-tenant laws are more landlord favored.”

Non-Housing Community Development Needs Assessment

YMCA strengthen the foundations of community by developing successful youth, engaging people in healthy living, and instilling a commitment to social responsibility.

Partners for Prosperity is dedicated to reducing poverty by building assets and creating opportunities. We believe in marshalling resources, forming partnerships and developing innovative programs to benefit working and low income people.

United Way specialties are understanding the myriad of struggles facing the community and improving the lives of individuals and families.

Idaho Falls Downtown Development Corp. (IFDDC) concentration is within historical downtown, which is the regional center for commerce, culture and leisure activities for residents and visitors.

Veterans Memorial Commission supports veteran affair services.

1. Describe the jurisdictions need for Public Facilities:

- “Transportation issues (not necessarily public transportation), employment in the neighborhood where they live. Affordable daycare services primarily for LMI families.”
- “Centers to train for more financial education, soft education for self-skills training, professional technical education, bankruptcy counseling.”
- “Accessibility for disabled, Low to moderate income housing improvements downtown, public facilities.”
- “ADA accessibility.”

2. Describe the jurisdictions need for Public Improvements:

- “Facility security (doors and locks), heating, playgrounds and parks.”
- “ADA improvements downtown, Yellowstone crossing crosswalk compliance, water and sewer upgrades downtown, public restrooms downtown.”
- “ADA parking stalls and drop-off area, better access to TRPTA.”

3. Describe the jurisdictions need for Public Services:

- “Employment needs, Food Stamps, Emotional support.”
- “Financial education and planning for LMI groups, digital literacy for elderly, financial education in the workplace, STEM education, self-skill training (basic life skills).”
- “Help with under employment for LMI families. Transportation a huge issue, specifically getting from home to work. TRPTA doesn't have route consistency and limited options. Areas of need include homelessness, lack of food, mental illness. Seniors are a huge at risk population that is growing rapidly. They struggle with food, need home deliveries, and have people check up on them. Life skills for those who are in transition homes or suffer from mental health issues. Dental care needs, utility bill help, gas money for transportation, basic needs. Working parents with children education opportunities. Prevention programs.”
- “Homeless Stand-down, Help 4 Vets.”

Housing Market Analysis: Number of Housing Units

Idaho Housing and Finance Idaho Housing (IHFA) is a uniquely created and organized financial institution and administrator of affordable housing resources. In its simplest form, Idaho Housing’s mission is to provide funding for affordable housing opportunities in Idaho communities where they are most needed and when it is economically feasible.

1. Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

- No response provided.

2. Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

- “There are currently no units expected to be lost.”

3. Does the availability of housing units meet the needs of the population?

- “Right now the availability of housing units meet the needs of the populations.”

4. Describe the need for specific types of housing:

- “There is no public housing available.”

Housing Market Analysis: Cost of Housing

Idaho Housing and Finance Idaho Housing (IHFA) is a uniquely created and organized financial institution and administrator of affordable housing resources. In its simplest form, Idaho Housing’s mission is to provide funding for affordable housing opportunities in Idaho communities where they are most needed and when it is economically feasible.

1. Fair Market Rents

- 1 Bedroom - 498
- 2 Bedroom - 674
- 3 Bedroom - 951
- 4 Bedroom -1194

III. EVALUATION OF JURISDICTION’S CURRENT FAIR HOUSING LEGAL STATUS

- A. Fair housing complaints or compliance reviews where the Secretary has issued a charge of or made a finding of discrimination.

Cities in the state of Idaho don’t have the authority to investigate or prosecute Fair Housing Laws. The state of Idaho has given that authority to the **Idaho Human Rights Commission (IHRC)**.

The general purposes of the IHRC is to:

(1) To provide for execution within the state of the policies embodied in the federal Civil Rights Act of 1964, as amended, and the Age Discrimination in Employment Act of 1967, as amended, and Titles I and III of the Americans with Disabilities Act.

(2) To secure for all individuals within the state freedom from discrimination because of race, color, religion, sex or national origin or disability in connection with employment, public accommodations, and real property transactions, discrimination because of race, color, religion, sex or national origin in connection with education, discrimination because of age in connection with employment, and thereby to protect their interest in personal dignity, to make

available to the state their full productive capacities, to secure the state against domestic strife and unrest, to preserve the public safety, health, and general welfare, and to promote the interests, rights and privileges of individuals within the state.

The work that provided the basis for this publication was supported by funding under a grant with the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public.

According to the Idaho Human Rights Commission, from January 1, 2011-October 19, 2015, a total of 34 cases alleging housing discrimination were filed in this period. Of the housing cases that have been filed with the Commission. Since October 17, 2015, when this report was generated, there office had received another housing complaint, thus bring the total to 34 charges.

The Intermountain Fair Housing Council (IFHC) is a nonprofit organization that provides information and education services to housing consumers, housing providers, community organizations, and lending institutions; Monitors fair housing compliance of housing providers, lending institutions, and local and state governments; Engages in enforcement activities which include investigation, testing, and complaint filing with State or Federal authorities; and negotiates fair housing settlements by mediation, conciliation, or litigation, if necessary.

The Intermountain Fair Housing Council has done testing in the areas of steering based on disability, discriminatory ads, familial status, reasonable accommodations and design and construction.

Intermountain Fair Housing Council has provided data that describes the types and dates of fair housing complaints that have been made in the city of Idaho Falls from the time period of January 2011 - 2015 are describe below in **Exhibit 24.**

These organizations provide statewide fair housing services to the citizens of Idaho.

Exhibit 24. - Intermountain Fair Housing Council 2011- 2015

CASE TYPE	ISSUE	NUMBER OF CASES	COMMENTS
COMPLAINTS			
	Refusals for reasonable accommodations	77	
	Design and construction	3	Accessibility
	Landlord/Tenant	36	
	Discriminatory Statement based on Race	1	
	Familial Status	2	
	Discrimination based on sexual orientation	1	
	Discriminatory Statement	2	
	Discriminatory Ads	2	
	Sexual Harassment	2	Hostile
	Sexual Harassment	1	Quid Pro Quo
	Discrimination based on National Origin	2	
	Fair Lending	1	
FAIR LENDING PRACTICES		1	
CASES THAT WENT TO COURT		1	Fair Housing discrimination suit filed by Intermountain Fair Housing Council - Discriminatory Statement
HATE MESSAGE		1	Denial of RM (room)

Source: Intermountain Fair Housing Council, 2015

In addition, **Idaho Legal Aid (ILA)** services supports issues that impact Idaho residents regarding domestic violence, homelessness, food, healthcare issues and benefits, discrimination, outreach and education and supporting coalitions among the legal community to fight social problems. They may receive fair housing inquiries, but these inquiries are forward to the Intermountain Fair Housing Council.

B. Fair housing discrimination suit filed by the Department of Justice or private Plaintiffs. The Intermountain Fair Housing Council has had (1) Fair Housing discrimination suit that is identified in Exhibit 24, as a fair housing suit.

C. Reasons for any trends or patterns

It seems that educating the public, professionals and others regarding fair housing statutes continues to be a challenge. Training in Idaho Falls and the top 10 cities in the state have available to them annual fair housing training. Intermountain Fair Housing Council with a partnership with the local jurisdictions, Idaho Legal Aid and area nonprofits sponsor full day Fair Housing Workshops in various regions in Idaho.

In Idaho Falls the workshop was held on May 6. The workshop was sponsored by the of Idaho Falls in partnership with the City of Pocatello, Intermountain Fair Housing Council, Idaho Legal Aid, Idaho Housing and Finance Association and various neighborhood and community service organizations. Topics included part Fair Housing Basics and Advance training, Service Animals and Reasonable Accommodations and Fair Housing Compliance. Presenters included Zoe Ann Olson, Attorney and Executive Director, Intermountain Fair Housing Council, Sarah Fisher, Senior Investigator, Idaho Human Rights Commission and David Penny, Attorney, who was giving a Housing Provider Attorney's Perspective.

D. Discussion of other fair housing concerns or problems.

There are three general issues that continue to be a challenged.

1. The general lack of knowledge by potential home renters, buyers, and general public about the requirements of the Fair Housing Act.
2. The lack of understanding by developers and landlords about housing accessibility requirements under the Fair Housing Act and which standards apply. The issue regarding Service Animals and Reasonable Accommodations regulations continue to be an important topic.
3. Another concern is educating the public regarding what is fair housing.

IV. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

A. Public Sector

1. Zoning and Site Selection

a. City of Idaho Falls, Community Development Services Dept. Planning Division

1) The term group home is not defined in the zoning or subdivision ordinance or comprehensive plan, but the city follows the State of Idaho's definition of family Idaho Statue 67-6531- Single Family Dwelling.

a) For the purpose of any zoning law, ordinance or code, the classification "single family dwelling" shall include any group residence in which eight (8) or fewer unrelated persons with disabilities or elderly persons reside and who are supervised at the group residence in connection with their disability or age related infirmity.

b) Resident staff, if employed, need not be related to each other or to any of the persons with disabilities or elderly persons residing in the group residence.

c) No more than two (2) of such staff shall reside in the dwelling at any one time.

2) Manufactured home in many communities may be the only affordable housing unit available to low and moderate income residents. Idaho Code 67- 6509A states that each governing board shall amend its comprehensive plan and land use regulations for all land zoned for single-family residential uses, except for lands falling within an area defined as a historic district under section 67-4607, which the City of Idaho Falls complies. Manufactured homes are allowed in any residential zone.

3) The Idaho Falls zoning ordinance allows for lot sizes of a minimum of 5,000 square feet and no maximum size within its standard zones. Trending in the country are small foot print housing developments. One of the defining costs for development of new affordable housing units is the costs of land. The City

should look towards alternatives to standard lot development for new housing types. The City's Planned Unit Development ordinance, which does not require minimum lot sizes and permits clustering of housing units, is an example of such an alternative.

4) In census tract 9712, the Idaho Falls Redevelopment Agency (IFRDA), the local urban renewal agency, has released a Request for Proposals (RFP) for a development project. Part of that project will include remodeling of an historic hotel where some LMI populations reside. IFRDA has requested that the proposal should include a component to provide replacement housing for any displaced residents. It has also recommended providing a mix of subsidized and market rate housing.

5) Second, with the help of Community Development Block Grant (CDBG) funds provided by Housing and Urban Development (HUD), code enforcement has initiated a neighborhood cleanup campaign. During the spring and summer months, fliers explaining City Codes and instructions for the cleanup are distributed to each resident in a particular neighborhood. That neighborhood is then provided with two 30-yard dumpsters for a week. Residents may deposit junk, debris, tree clippings, etc. that may have been accumulating in their yards. Following the cleanup, the entire neighborhood is inspected for violations.

2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

a. Targhee Regional Public Transportation Authority (TRPTA)

The local regional transportation authority. Responsibilities that particularly relate to the Analysis of Impediment include:

- 1) When deemed necessary, form subcommittees to assist in the development of transportation plans, studies and programs;
- 2) Review and consider citizen input regarding transportation plans, studies, programs and projects.

b. In their November 7, 2012 Report the following comments were made.

1) Clients Living in Low or Moderate Income Areas - Agencies were asked if their clients/customers tend to live in low or moderate income areas of the Idaho Falls urbanized areas (Idaho Falls, Ammon, Ucon, Iona, and Bonneville County around these cities). The eight agencies that responded to this question all reported that their clients/customers tend to live in low or moderate income areas of the Idaho Falls urbanized area. Agencies were then asked if they were willing to work with TRPTA staff in identifying the general areas and discuss whether a route bus stop in the area would be helpful to their clients. All agencies gave an affirmative response to that question.

2) Identify Hours that Clients Need Service - Agencies were asked to identify their client's service needs on Monday through Friday, as well as Saturday and Sunday for both the TRPTA route service and the door-to-door demand-response service. Only three agencies responded to that question. Two agencies indicated that the hours of operation on the TRPTA route service, Monday through Friday, should be 7:00 a.m. to 6:00 p.m. Two agencies indicated that the hours of operation on the TRPTA route service on Saturday and Sunday should be 10:00 a.m. to 5:00 p.m. For the TRPTA demand-response service, two agencies indicated that the hours of operation on the TRPTA demand-response service, Monday through Friday, should be 8:00 a.m. to 6:00 p.m. Two agencies indicated that the hours of operation on the TRPTA demand-response service on Saturday should be 10:00 a.m. to 2:00 p.m. to serve their clients' needs.

3) Transportation Needs Not Currently Met - Agencies were asked to identify transportation needs that they felt were not currently being met. Examples of typical service requests were listed such as staff and/or client training on use of available services; more frequency (every hour, every half-hour, every 15 minutes); and published route stops at particular destinations not currently served by a route. Agencies were given a chance to select multiple responses. Eight agencies responded to this question. Three responses identified staff and/or client training on use of available services as the needs not currently been met. Two responses reported that they would like service with more

frequency of every half-hour. Two responses indicated the need for transportation on weekends, one response especially emphasized the need for transportation on Saturday as their clients work in the community during that day of the week.

4) Public Involvement, Service, Final Report - Destinations listed as not currently served by a route include Fred Meyers and the local homeless shelters like Eagle Pointe.

5) Other Public Transportation Needs - Respondents were asked to identify other public transportation needs they felt were not been met.

6) In general, people reported that they want service on weekends (especially on Saturdays), evening service, on-time service, and that the service needs more bus stops. Other comments relevant to this study were the desire for a reliable service so that they could get to work and the request to do away with deviations. There was also a comment from a respondent who was happy with the TRPTA service as she was able to get her daughter to school and work.

- c. The lack of public transportation impacts discussion. The lack of transportation limits movement of citizens of Idaho Falls. It can limit their access to employment, medical services, and essential services.

3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Idaho Housing and Finance Association (IHFA) is a key partner to the City. IHFA operates low-rent public housing, manages the Section 8 Rental Assistance and Family Self-Sufficiency Program, and offers homebuyer education, down payment assistance and residential mortgage loans. The Section 8 Certificate Rental Voucher Program is designed to give low-income families more choice in locating decent, safe, and sanitary rental housing. Having the freedom and mobility to live where they choose allows individuals and families a greater access to increased employment options, choice in schools, increased personal and property safety.

4. Sale of Subsidized Housing and Possible Displacement

The Idaho Falls Downtown Development Corp. (IFDDC), the local urban renewal agency, has released a request for proposal (RFP) for a redevelopment project. Part of that project will include the razing of a hotel, where some LMI populations reside. Urban Renewal agency has requested that the proposal should include a component to provided replacement housing for LMI population. Until the proposal is submitted, it hasn't been determined if the location of the housing units will be in the same area or located on scattered sites throughout the city.

5. Property Tax Policies

Cities in the State of Idaho do not have authority to levy taxes.

6. Planning/Building Divisions Boards and City Council

1) The City of Idaho Falls Planning Commission consist of 10 members; 5 men, 5 women. The membership consist of school district employees, Idaho National Laboratory (INL) engineers, an architect, a retiree who was in the construction industry, a hydrologist, a financial advisor, and a consultant. There are no minorities or members of a protected classes. The planning director is very interested in attracting someone from the Hispanic community to serve. The director recognizes a member from the Hispanic community should be represented.

2) In regards to fair housing training City Council receives updates during Public Hearings of Fair Housing activities completed with annual CDBG funds during the Annual Action Plan process and the Comprehensive Annual Performance Review and Evaluation (CAPER) process. FH training is attended and or sponsored every year by the Grant Administrator and a portion of the funds are set aside to sponsor the training. The City partners with Pocatello and IHFA and rotates locations for the training. The City Attorney and/or staff attend and Council members have attended in the past. For 2015, the training was held in Idaho Falls and was co-sponsored with Pocatello and IHFA.

The Mayor, City Council and the Planning Commission are encouraged to attend fair housing training.

7. Building Code (Accessibility)

The building department staff reviews accessibility standards when they review building permits. They do not have an official checklist and refer directly to Chapter 11 of the 2012 International Building Code (IBC) and the ANSI A17.1 for Accessible and Usable Buildings and Facilities. Accessibility standards for City Code is the IBC and ANSI A17.1.

In addition, the City had an Accessibility Commission up until Jan of 2014. The Commission looked at ADA concerns with city facilities and programs, completed assessments, and made recommendations.

From 2010 to 2014, the goal of the Commission was to assess, make recommendations, and provide a priority for the City to refer as budgets and grant cycles came available. The Commission is operating on an as needed basis until further direction.

B. Private Sector

1. Lending Policies and Practices

Fair lending is more difficult to detect and to prove. However, there are laws other than the Fair housing Law to assist some communities in aggressively scrutinizing fair lending activity. One such law is the Home Mortgage Disclosure Act (HMDA) that requires banks to publish a record of their lending activities annually.

Frequently, fair housing enforcement agencies and nonprofits will use this data to help substantiate a discrimination claim or to determine a bank's racial diversification of loans. HMDA data show the location and dollar amount of reporting lender's loans by census tract. These data also contain racial and ethnic information for borrowers.

The Federal Reserve Board provides computerized HMDA reports to designated Federal depository institutions and mortgage banking institutions subject to HMDA in central Metropolitan Statistical Areas (MSAs). This process makes the data highly accessible to interested persons and organizations at the local level. HMDA reporting requirements do not apply to financial institutions located outside MSAs. Idaho Falls is one of four cities that holds MSA status in Idaho.

HMDA data does not provide information about individuals, unsuccessful applicants or successful borrows, nor do they provide information on individual housing units or the reason for lending decisions. HMDA can provide information on the characteristics of census tracts and

neighborhoods in relation to the flow of credit to each such area. These data only serves as an indicator of problems, not a full description of them.

Another law frequently utilized by community organizations is the Community Reinvestment Act (CRA). When a bank wants to merge with or buy another bank or establish a new branch, the community has an opportunity to comment. Usually, the CRA commitments made by the bank are analyzed, utilizing other data such as HMDA, to determine adherence. The community may challenge the action if the bank has a poor record. Sometimes agreements can be reached wherein the bank promises a certain level of commitment to the community.

Additionally, the Equal Credit Opportunity Act (ECOA) prohibits discrimination in lending.

C. Public and Private Sector

1. Fair Housing Enforcement

The City of Idaho Falls doesn't have the authority to conduct Fair Housing enforcement on Idaho State Statutes. As mentioned in Section III, the Idaho Human Rights Commission (HRC) for the state of Idaho and the Intermountain Fair Housing Council (IFHC) as a nonprofit organization have that authority.

2. Information Programs

The Fair Housing Forum (FHF) consists of members from throughout the state of Idaho, such as entitlement cities (Boise, Meridian, Nampa, Pocatello and Idaho Falls), Fair Housing advocates, attorneys that represent fair housing clients, fair housing advocates, housing providers, and representatives from the Intermountain Fair Housing Council, , Idaho Legal Aid and Idaho Human Rights Commission.

It is managed by Erik Kingston, Idaho Housing and Finance Association (IHFA). There are material developed by the city of Boise which is shared with others cities and organization to promote fair housing. Such as fair housing posters, radio and TV ads and fair housing information cards. Some items are available in Spanish, Arabic, Somalian, French and Bosnian.

Other information that is available include prepare materials which are available thru IFHA, such as, Fair Housing Forum information folders, Ramp Up Idaho brochures, web sites, fair housing videos and posters. Most of the information which is published by the cities can be acquired on the Fair Housing Forum web site. Statewide 211 calls are managed by the State of Idaho Health and Welfare office. They assist in directing fair housing questions and complaints to the appropriate agency.

3. Visitability in Housing

As stated earlier, the City of Idaho Falls Building Department reviews accessibility standards while they review building permits in new construction.

- D. Where there is a determination of unlawful segregation or other housing discrimination by a court** or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973, or where the Secretary has issued a charge under the Fair Housing Act regarding assisted housing within a recipient's jurisdiction, an analysis of the actions, which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds by the jurisdiction. There is no indication of any segregation in the City of Idaho Falls.

V. Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

In addition to Fair Housing Month activities, the city participates in the Continuum of Care (CoC) through the Region 6 Housing Coalition. The Grant Administer represents the City of Idaho Falls during regular monthly meetings. Through collaboration and coordination, the Coalition provides the opportunity for the exchange of information, including referrals, among service provide agencies. The Coalition also plan and coordinate local events such as: the HUD/IHFA Point in Time Count, Homeless Stand Down, April as Fair Housing Month, Fair Housing Training, and ADA Days. For 2016, the Grant Administrator is assisting with the planning of the Annual the Point in-time Count and helping with the local Homeless Stand Down event to be held Jan 30, 2016.

V1. 2009-2015 Analysis of Impediments-Fair Housing Comparison

2009-10 Impediments found through in-house review of Public/Private Sector policies and practices.

1. There is a general lack of knowledge by potential home renters, buyers, and the general public about the requirements of the Fair Housing Act.
2. There continues to be a need for pre-housing counseling so that renters or buyers understand the costs and responsibilities of buying or renting a home.
3. The percentage of income that can be used for housing rental/purchase payments is very limited among low- and moderate-income families. Down payment, closing, utility hook-up and deposit costs are beyond the reach of many would-be low income renters and homeowners.
4. There is a continuing need for vouchers under the Section 8 Rental Assistance Program.
5. Cost of housing continues to rise with Affordability for low-income families in the \$80,000-\$90,000 range.
6. There is a lack of understanding by developers and landlords about housing accessibility requirements under the Fair Housing Act and which standards apply.

According to Intermountain Fair Housing from January of 2009 to September 2009:

1. 12 complaints in Idaho Falls, all resolved and found the owners to be in violation.
2. 6 pending cases were also under review and 90% of the complaints were against landlords or owners who are disabled and do not have some type of accommodation provided to them by the property owner. This is a major problem and needs to be addressed.

2015 Impediments found by Planning and Facility Management, independent consultant

1. Expansion of Inventory with regards to affordable housing needed.
2. The building community is not building affordable housing units.
3. Expansion of housing options.
4. The public is lacking knowledge of the Fair Housing Act.
5. There is a need to expand membership of minorities or protected classes as members on the Planning Commission.
6. Some developers and landlords continue to have a lack of understanding of housing accessibility requirements under the Fair Housing Act.
7. Some landlords continue to have a lack the understanding of the requirements regarding service animals.
8. There are some gaps in public transportation access to services for protected classes.
9. There is a continuing need for vouchers under the Section 8 Rental Assistance Program.

According to Intermountain Fair Housing from January of 2011-2015:

1. 133 complaints cases in Idaho Falls;
2. (1) Fair Housing discrimination suit filed by Intermountain Fair Housing Council;
3. 77 of the 133 complaints were refusals for reasonable accommodations;
4. 33 of the 133 complaints were landlord/tenant related.
5. The remaining 22 complaints were various fair housing discrimination issues.

VII. Conclusions and Recommendations

The City of Idaho Falls is moving in the right direction to deal with local fair housing issues. The first positive step was to prepare a housing needs assessment in order to receive input from service providers of the City regarding housing issues. The needs assessments identified gaps in services. In some cases the City may not be able to tackle issues and needs by themselves. Another concern identified, was the need for the development of additional affordable housing. The next step in this process is to receive input from city residents. The City may wish to consider developing a community survey to gauge the community's knowledge of the City of Idaho Falls's housing issues.

One of the major cost of development is the acquisition of land. The City may wish to explore other creative opportunities with community leaders and local partners to explore opportunities to establish affordable housing.

Based upon the 2015 needs assessment, the homeless population was identified by service providers as, single family head of households, the elderly, those with disabilities, unemployment and underemployment. In regards to housing assistance, people who are disabled or victims of domestic violence, dating violence, sexual assault and stalking were also identified. The Rescue Mission indicated that approximately 30% of their clients are disabled, and 10% are known victims of domestic violence.

The Region 6 Housing Coalition, which comprises of service providers throughout the region, provides an important role to assist the city. The city's Grant Administrator is part of the organization and attends their monthly meetings. The Grant Administrator may want to consider an additional group such as a Fair Housing Task Force. The Task Force could focus on more details and issues that are identified in the Analysis of Impediments.

The Grant Administrator has encouraged elected and appointed officials, as well as, staff to attend annual fair housing training annually. The Grant Administrator may consider establishing an annual fair housing training during a City Council Work Session involving Planning and Building Divisions, within the Community Development Services Department, so they may receive a one on one presentation.

Finally, some communities have looked at creative opportunities to increase the availability of affordable housing. The Idaho Falls zoning ordinance allows for lot sizes of a minimum of 5,000 square feet and no maximum size within its standard zones. Trending in the country are small foot print housing developments and one of the defining costs for development of new affordable housing is the costs of land. The City's Planned Unit Development ordinance, which does not require minimum lot sizes and permits clustering of housing units, is an example of such an alternative.

VIII. Signature Page



Rebecca L. Noah Casper, Mayor
City of Idaho Falls

RESOLUTION NO. 2016-02

A RESOLUTION OF THE CITY OF IDAHO FALLS, IDAHO, FISCAL
YEAR 2016 CDBG ANNUAL ACTION PLAN AND FISCAL YEARS
2016-2020 CDBG FIVE-YEAR CONSOLIDATED PLAN.

WHEREAS, the City of Idaho Falls has been designated as an entitlement city by the U.S. Department of Housing and Urban Development;

WHEREAS, the City of Idaho Falls, Idaho, has prepared a One-Year CDBG Annual Action Plan for Fiscal Year 2016 as part of the requirements of entitlement status;

WHEREAS, the City of Idaho Falls, Idaho, has prepared a Five-Year CDBG Consolidated Plan for Fiscal Years 2016-2020 as part of the requirements of entitlement status;

WHEREAS, the City of Idaho Falls, Idaho, has prepared an Analysis of Impediments to Fair Housing to be submitted as part of the Five-Year CDBG Consolidated Plan for Fiscal Years 2016-2020 as part of the requirements of entitlement status;

WHEREAS, the City of Idaho Falls, Idaho, held a public hearing on the Annual Action Plan FY2016 AND the Consolidated Plan FY2016-2020 on December 10, 2015;

WHEREAS, the City of Idaho Falls, Idaho, had a thirty day comment period until and through January 11, 2016;

WHEREAS, the City of Idaho Falls, Idaho, has considered comments received during the thirty day comment period;

NOW, THEREFORE, be it resolved by the Mayor and City Council of the City of Idaho Falls, Idaho, as follows:

1. The Annual Action Plan for Fiscal Year 2016 and the Consolidated Plan for Fiscal Years 2016-2020, as prepared by the Community Development Services Department, Planning Division, a copy of which is attached hereto and by this reference made a part of hereof, is hereby approved.

2. The Mayor is hereby authorized to sign the document(s) for Federal assistance.



Kathy Hampton

Kathy Hampton, City Clerk

Rebecca L. Noah Casper
Rebecca L. Noah Casper, Mayor

Date JANUARY 26, 2016